May 7, 2002

BY E-MAIL

Charles Robinson, Esq. General Counsel California Independent System Operator P.O. Box 639014 Folsom, CA 95763-9014

> Re: <u>Fact-Finding Investigation of Potential Manipulation of Electric and</u> Natural Gas Prices, FERC Docket No. PA02-2-000

Dear Mr. Robinson:

On February 13, 2002, the Commission issued an order stating that it intended to gather information on whether any entity, including any Enron Corporation (through any of its affiliates or subsidiaries) manipulated short-term prices for electric energy or natural gas in the West or otherwise exercised undue influence over wholesale electric prices in the West since January 1, 2000, resulting in potentially unjust and unreasonable rates in long-term power sales contracts subsequently entered into by sellers in the West.

Pursuant to that order, I hereby request that California Independent System Operator (ISO) provide the following data with hourly granularity for the time period January 1, 2000 through December 31, 2001:

- 1. All day-ahead and hour-ahead bids into the ISO's imbalance energy and ancillary services markets identified by scheduling coordinator and unit.
- 2. All energy bids associated with self-provided ancillary services identified by scheduling coordinator, unit, and ancillary service.
- 3. All adjustment bids and dispatched adjustment bids for both internal and external resources identified by scheduling coordinator and resource.
- 4. The real-time supply curve, *i.e.*, the BEEP stack, consisting of all valid imbalance energy bids and energy bids associated with accepted ancillary service bids and self-provided ancillary services.

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- 5. Any records of out-of-sequence dispatches from the BEEP stack.
- 6. Records of all out-of-market purchases by counter-party, date, duration, price, and volume.
- 7. Day-ahead and hour-ahead scheduled generation and ancillary service awards by scheduling coordinator for every unit in the ISO's control area.
- 8. Metered generation for every unit in the ISO's control area.
- 9. Day-ahead and hour-ahead schedules and ancillary service awards by scheduling coordinator for every relevant resource external to the ISO.
- 10. Reported outages by scheduling coordinator and unit.
- 11. Provide a copy of the Inter-SC Trade Table.
- 12. For each month during the years 2000 and 2001, identify the ten largest scheduling coordinators in terms of congestion revenues and provide the monthly congestion revenues for each scheduling coordinator.
- 13. Refer to the three Enron Corporation memoranda on trading strategies and ISO sanctions that are attachments to the follow-up data request to Enron dated May 6, 2002. These memoranda are posted on the Commission's web page for Docket No. PA02-2-000. Provide copies of any ISO materials (reports, memoranda, etc.) that document the use of such trading strategies during 2000 and 2001, by either Enron or any other market participant, or that were produced in conjunction with an investigation into such trading strategies, whether the subject of the investigation was Enron or any other market participant.

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Your response to this information request is due no later than May 10, 2002. To the extent that the ISO's response to this information request includes confidential or commercially-sensitive material, you may request privileged treatment of such material pursuant to 18 C.F.R. § 388.112 (2001). Thank you.

Very truly yours,

Donald J. Gelinas Associate Director Office of Markets, Tariffs and Rates